

United States Courts
Southern District of Texas
FILED

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

VS.

CRIMINAL NO. H-25

4:25-cr-0010

- 1) **KEITH FITZGERALD WARD**
- 2) **JERTAVIOUS HADNOTT**
- 3) **CALVIN TERRENCE WILLIAMS**
aka BUCKS
- 4) **DAVID RENE BALDERAS**
- 5) **ISIAH LASHON DIXON,**
aka WOODY
- 6) **TREA-VEON DEBERRY**
- 7) **NATALIE BOLANOS-BALDERAS**
- 8) **JKOREAN HADNOTT**
- 9) **RIQUAN NICHOLAS JONES**
- 10) **JALISA JANEY WILLIAMS**
- 11) **CALEI LAMONT GARRETT**
- 12) **JAVARIUS DEANTE LEBLANC**

INDICTMENT

The United States Grand Jury charges:

At all times material herein:

1. The United States Treasury was a financial institution which is guaranteed by the United States Government.
2. The Federal Deposit Insurance Corporation (FDIC) was an agency of the federal government which insured the deposits of member banks against loss up to \$100,000 with the purpose of preventing their collapse and instilling public confidence in the nation's banking institutions.
3. Navy Federal Credit Union, including its branches, was a financial institution the deposits of which were insured by the FDIC.

4. Bank of America, including its branches, was a financial institution the deposits of which were insured by the FDIC.

5. Wells Fargo Bank, NA, including its branches, was a financial institution the deposits of which were insured by the FDIC.

6. J.P. Morgan Chase Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

7. Cadence Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

8. Farmers Bank and Trust, including its branches, was a financial institution the deposits of which were insured by the FDIC.

9. Commerce Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

10. Star Financial Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

11. Transpecos Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

12. Westside Bank, including its branches, was a financial institution the deposits of which were insured by the FDIC.

COUNT 1

(Conspiracy - 18 U.S.C. § 1349)

A. INTRODUCTION

1. The Grand Jury adopts, realleges, and incorporates the allegations in paragraphs 1

-12 of the Introduction of this Indictment as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. From on or about February 23, 2023 and continuing until at least on or about March 24, 2024, in the Houston Division of the Southern District of Texas and elsewhere,

- 1) KEITH FITZGERALD WARD
- 2) JERTAVIOUS HADNOTT
- 3) CALVIN TERRENCE WILLIAMS, aka BUCKS
- 4) DAVID RENE BALDERAS
- 5) ISIAH LASHON DIXON, aka WOODY
- 6) TREA-VEON DEBERRY
- 7) NATALIE BOLANOS-BALDERAS
- 8) JKOREAN HADNOTT
- 9) RIQUAN NICHOLAS JONES
- 10) JALISA JANEY WILLIAMS
- 11) CALEI LAMONT GARRETT
- 12) JAVARIUS DEANTE LEBLANC

Defendants herein, did knowingly and willfully combine, conspire, confederate, and agree with each and others known and unknown to the Grand Jury to execute and attempt to execute a scheme and artifice to defraud the United States Treasury and Navy Federal Credit Union, Bank of America, Wells Fargo Bank, J.P. Morgan Chase Bank, Cadence Bank, Farmers Bank and Trust, Commerce Bank, Star Financial Bank, TransPecos Bank, and Westside Bank, financial institutions the accounts of which were insured by the FDIC, and to obtain money, funds, and property under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344 (Bank Fraud);

C. THE MANNER AND MEANS OF THE CONSPIRACY

The manner and means of the conspiracy were as follows:

3. The conspirators unlawfully acquired checks which had been stolen from the United States Mails.

4. The conspirators actively recruited for more participants with bank accounts that unlawfully acquired checks could be deposited into and withdrawn from.

5. The conspirators altered the name of the payees on the stolen checks and deposited them into accounts that they controlled.

7. The conspirators withdrew the proceeds of the stolen checks from the bank accounts of deposit.

8. The conspirators unlawfully acquired and deposited stolen checks totaling at least \$2,350,000.00.

D. OVERT ACTS

9. In furtherance of the conspiracy, and to affect the objects thereof, the conspirators performed and caused to be performed, among others, the overt acts listed below in Counts Two through thirteen of this indictment.

In violation of Title 18, United States Code, Sections 1349 and 1344.

COUNTS 2- 13

(Bank Fraud - 18 U.S.C. § 1344)

A. INTRODUCTION

1. The Grand Jury adopts, realleges, and incorporates herein the allegations in paragraphs 1- 12 of the Introduction of this Indictment as if set out fully herein.

B. THE SCHEME AND ARTIFICE TO DEFRAUD

2. From on or about February 23, 2023 and continuing until at least on or about March 24, 2024, in the Houston Division of the Southern District of Texas and elsewhere,

- 1) KEITH FITZGERALD WARD
- 2) JERTAVIOUS HADNOTT

- 3) CALVIN TERRENCE WILLIAMS, aka BUCKS
- 4) DAVID RENE BALDERAS
- 5) ISIAH LASHON DIXON, aka WOODY
- 6) TREA-VEON DEBERRY
- 7) NATALIE BOLANOS-BALDERAS
- 8) JKOREAN HADNOTT
- 9) RIQUAN NICHOLAS JONES
- 10) JALISA WILLIAMS
- 11) CALEI LAMONT GARRETT
- 12) JAVARIUS DEANTE LEBLANC

Defendants herein, did knowingly execute and attempt to execute a scheme and artifice to defraud United States Treasury and Navy Federal Credit Union, Bank of America, Wells Fargo Bank, J.P. Morgan Chase Bank, Cadence Bank, Farmers Bank and Trust, Commerce Bank, Star Financial Bank, TransPecos Bank, and Westside Bank, financial institutions the deposits of which were insured by the FDIC, and to obtain moneys and funds owned by and under the custody and control of the above-listed financial institutions, by means of false and fraudulent pretenses, representations, and promises as further set forth in the counts below.

C. THE MANNER AND MEANS OF THE SCHEME AND ARTIFICE TO DEFRAUD

3. Among the manner and means by which the Defendants sought to accomplish and did accomplish the purpose of the scheme to defraud are the acts set forth in paragraphs 3 through 8 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. EXECUTION OF THE SCHEME AND ARTIFICE

4. On or about the following dates, in the Houston Division of the Southern District of Texas, the Defendants executed and attempted to execute the scheme and artifice set forth above by knowingly and fraudulently conducting the following transactions, by depositing stolen checks into accounts as described in the Counts below:

COUNT	DATE OF DEPOSIT	AMOUNT OF CHECK	DESCRIPTION OF CHECK	DEFENDANTS
TWO	February 23, 2023	\$9,218.97	Drawn from a United States Treasury Check.	1) KEITH FITZGERALD WARD
THREE	April 7, 2023	\$14,500.00	Drawn from a United States Treasury Check.	2) JERTAVIOUS HADNOTT
FOUR	May 17, 2023	\$13,889.32	Drawn on the Wells Fargo Bank account of Seaview Partners LLC.	3) CALVIN TERRENCE WILLIAMS 4) DAVID RENE BALDERAS
FIVE	June 10, 2023	\$23,000.00	Drawn on the Cadence Bank account of Strong Haul Trucking LLC.	5) ISIAH LASHON DIXON 6) TREA-VEON DEBERRY
SIX	June 13, 2023	\$37,564.41	Drawn on the Wells Fargo Bank account of U. S. Water Services Corporation.	3) CALVIN TERRENCE WILLIAMS 4) DAVID RENE BALDERAS 7) NATALIE BOLANOS BALDERAS
SEVEN	June 29, 2023	\$23,000.00	Drawn on A Chase Bank Account Cashier's Check.	2) JERTAVIOUS HADNOTT 8) JKOREAN HADNOTT
EIGHT	July 5, 2023	\$56,277.08	Drawn on the Farmers Bank and Trust account of Prosper Independent School District Finance Clearing.	9) RIQUAN NICHOLAS JONES
NINE	August 17, 2023	\$9,880.00	Drawn from the Commerce Bank account of Chief Chef Industries Inc.	10) JALISA JANEY WILLIAMS

COUNT	DATE OF DEPOSIT	AMOUNT OF CHECK	DESCRIPTION OF CHECK	DEFENDANTS
TEN	October 27, 2023	\$19,545.71	Drawn from STAR Financial Bank account of Mccoy Bolt Works, Inc.	11) CALEI LAMONT GARRETT
ELEVEN	November 16, 2023	\$12,426.89	Drawn from the TransPecos Bank account of Aqueos Corporation.	1) KEITH FITZGERALD WARD
TWELVE	March 12, 2024	\$40,247.25	Drawn from the Westside Bank account of Dallas Metal Products, Inc.	12) JAVARIUS DEANTE LEBLANC
THIRTEEN	March 12, 2024	\$164,928.45	Drawn from J.P. Morgan Chase Bank account of Triple-S Steel Supply Intsel Steel.	12) JAVARIUS DEANTE LEBLANC

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT 14

(Felon in Possession of a Firearm – 18 U.S.C. § 922(g)(1))

On or about March 25, 2024, in the Houston Division of the Southern District of Texas, the Defendant,

8) JKOREAN HADNOTT

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a S&W 9mm Black and Grey pistol, said firearm having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 15

(Felon in Possession of a Firearm – 18 U.S.C. § 922(g)(1))

On or about March 14, 2024, in the Houston Division of the Southern District of Texas,
the Defendant,

12) JAVARIUS DEANTE LEBLANC

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a S&W 9mm Tan & Black handgun, said firearm having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

(18 U.S.C. § 982(a)(6))

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives
notice to the defendants,

- 1) KEITH FITZGERALD WARD**
- 2) JERTAVIOUS HADNOTT**
- 3) CALVIN TERRENCE WILLIAMS, aka BUCKS**
- 4) DAVID RENE BALDERAS**
- 5) ISIAH LASHON DIXON, aka WOODY**
- 6) TREA-VEON DEBERRY**
- 7) NATALIE BOLANOS-BALDERAS**
- 8) JKOREAN HADNOTT**
- 9) RIQUAN NICHOLAS JONES**
- 10) JALISA WILLIAMS**
- 11) CALEI LAMONT GARRETT**
- 12) JAVARIUS DEANTE LEBLANC**

that in the event of conviction of the offenses charged in Counts One through Thirteen of this Indictment, the United States intends to seek forfeiture of all conveyances used in and of all property used to facilitate, or intended to be used to facilitate, the commission of the offenses.

Money Judgment and Substitute Assets

The United States gives notice that it will seek a money judgment against the defendant. In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exist, the United States will seek to forfeit any other property of the defendants up to the value of the property subject to forfeiture.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that all firearms and ammunition involved in or used in the commission of the offense charged in Counts Fourteen and Fifteen, in violation of Title 18, United States Code, Section 922(g), are subject to forfeiture, including, but not limited to, the following:

- 1) S&W 9mm Tan & Black handgun, Serial Number FBV6821; and ammunition
- 2) 5.56 AR pistol AR-15 DTI 15 Semi Auto Rifle/pistol, Serial Number DTI-S189499 and ammunition
- 3) S&W 9mm Black and Grey Handgun, Serial Number FCX9076
- 4) Texas Shooter Supply AR15 Rifle, Serial Number 18000070T55-15,
- 5) Anderson Manufacturing AR15 Rifle, Serial Number 22130068

- 6) GLOCK 23 Black & Tan Color.40 caliber pistol, serial number WNM748
- 7) Miero Draco 7.62x39 Pistol, Serial Number PMD-19450-20 ROA
- 8) 5.56 AR-15 Rifle, No Serial Number

TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI

United States Attorney

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line extending to the right.

CELIA MOYER

Assistant United States Attorney